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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

DEBRA SLEDGE, JOAN SLEDGE,
KATHY SLEDGE LIGHTFOOT and KIM
SLEDGE ALLEN, jointly d/b/a "SISTER
SLEDGE"; RONEE BLAKLEY; and
GARY WRIGHT, on behalf of themselves
and all others similarly situated,

Plaintiffs,
v.
WARNER MUSIC GROUP CORP.,
Defendant.

CASE NO. 12-CV-0559-RS

**JOINT STIPULATION AND [PROPOSED]
SCHEDULING ORDER**
AS MODIFIED BY THE COURT
Judge: Hon. Richard Seeborg

1 Plaintiffs in the above captioned consolidated action and Defendant Warner Music Group
 2 Corp. ("WMG") together submit the following joint stipulation in regard to the following facts:

3 WHEREAS, on August 21, 2012, Plaintiffs filed a Consolidated Amended Complaint (the
 4 "Amended Complaint");

5 WHEREAS, WMG's response to the Amended Complaint is currently due September 28,
 6 2012;

7 WHEREAS, the parties are all desirous of participating in meaningful settlement
 8 discussions before any of the parties expend significant attorneys' fees in motion practice and
 9 discovery;

10 WHEREAS, in light of this joint goal, the parties have met and conferred and agreed that
 11 it is in the best interest of the parties and the Court to stay all current deadlines and dates in the
 12 litigation for a set period of time sufficient to allow the parties to participate in such settlement
 13 negotiations;

14 WHEREAS, the parties anticipate that there will likely need to be certain communications
 15 prior to any formal mediation session and that settlement could take multiple mediation sessions
 16 to reach agreement if any agreement can be reached;

17 WHEREAS, the parties also anticipate that it may take some time to schedule a mediation
 18 session with a mediator given the current schedules of possible mediators; and

19 WHEREAS, for these reasons, the parties anticipate that this process may take upward of
 20 six months.

21 Accordingly, the parties hereby agree and stipulate, subject to the approval of the Court, to
 22 the following:

A Further Case Management Conference will be set for March 14, 2013 at 10:00 a.m.

23 1. ~~All dates and deadlines currently on calendar are taken off calendar;~~

24 2. The parties shall have until February 28, 2013 to participate in meaningful
 25 mediation of this dispute; and

26 3. On February 28, 2013—or before that date if Plaintiffs and/or WMG believe that
 27 settlement cannot be reached at this juncture—a party or the parties shall file a
 28 statement/stipulation with the Court alerting the Court to the fact that settlement

JOINT STIPULATION & [PROPOSED]

ORDER

CASE NO. 12-CV-0559-RS

1 could not be reached and recommending a schedule for WMG's response to the
2 Amended Complaint (which deadline for WMG's response shall be no sooner than
3 30 days from the date of the statement) and subsequent dates and deadlines. In the
4 alternative, if the parties agree that further settlement discussions would be fruitful,
5 the parties can instead file a joint statement/stipulation seeking additional time for
6 further settlement negotiations.

7 Dated: August 31, 2012

8 Respectfully Submitted,

9 /s/ Tamerlin J. Godley

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11 Tamerlin J. Godley
12 MUNGER, TOLLES & OLSON LLP
13 *Attorneys for Defendant Warner Music Group*
14 *Corp.*

15 Dated: August 31, 2012

16 Respectfully Submitted,

17 /s/ Daniel L. Warshaw

18 Daniel L. Warshaw
19 PEARSON, SIMON, WARSHAW & PENNY LLP

20 *Interim Lead Counsel Representative for Plaintiffs**

21 * A complete list of the attorneys for Plaintiffs is attached to the Amended Complaint.

22 Filer's Attestation

23 I, Tamerlin J. Godley, am the ECF user whose identification and password are
24 being used to file this STIPULATION AND [PROPOSED] SCHEDULING ORDER. In
25 compliance with General Order 45.X.B., I hereby attest that the counsel listed above concur in
26 this filing.

27 Dated: August 31, 2012

28 /s/ Tamerlin J. Godley

Tamerlin J. Godley

JOINT STIPULATION & [PROPOSED]
ORDER
CASE NO. 12-CV-0559-RS

1 PURSUANT TO THIS STIPULATION, IT IS SO ORDERED.
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4 Dated: 8/31/12
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Honorable Ricahrd Seeborg
U.S. District Judge